

Exhibit 1

Wednesday, August 21, 2024 at 09:00:43 Central Daylight Time

Subject: Re: Couvillion v. White Marlin: Issues You Have Ignored
Date: Wednesday, August 21, 2024 at 8:59:39 AM Central Daylight Time
From: Jeb Golinkin
To: Schwank, Daniel
CC: Michael Cancienne, Denny, Danica, Eason, Suzanne
Attachments: image001.png, image002.jpg, image003.png

Daniel,

Thanks for your responses. You make a fair point on the searchable pdfs/metadata: I didn't realize we had produced as non-searchable pdfs with natives for the spreadsheets. It is not fair for us to ask of you what we did not do ourselves, so I'm withdrawing that portion of our request. If you are interested in exchanging relevant metadata overlays so you have those for your database, we are happy to do so.

-Jeb

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Joseph W. Golinkin II
Trial Attorney | Jordan, Lynch & Cancienne PLLC
(o) 713-955-4019 | (c) 832-250-6567
1980 Post Oak Blvd., Suite 2300 Houston, Texas 77056
www.jlcfirm.com | [Attorney Biography](#)



From: "Schwank, Daniel" <DSchwank@frilot.com>
Date: Monday, August 19, 2024 at 4:17 PM
To: Jeb Golinkin <jgolinkin@jlcfirm.com>
Cc: Michael Cancienne <mcancienne@jlcfirm.com>, "Denny, Danica" <DDenny@frilot.com>, "Eason, Suzanne" <Season@frilot.com>
Subject: RE: Couvillion v. White Marlin: Issues You Have Ignored

Hi Jeb,

Please see our comments below in red. Please also confirm that Defendants are withdrawing the notices of deposition for Jason Holvey and Mitch Dautreuil. As you are aware, we offered August 27 and August 28 for these depositions subject to the completion of Defendants' corporate depositions, which we have yet to receive dates for.

Thanks,
Daniel



Daniel E. Schwank (he/him)
1100 Poydras Street, Suite 3700
New Orleans, LA 70163

504.599.8247 office
504.599.8137 fax

From: Jeb Golinkin <jgolinkin@jlcfirm.com>
Sent: Saturday, August 17, 2024 5:30 PM
To: Schwank, Daniel <DSchwank@frilot.com>
Cc: Michael Cancienne <mcancienne@jlcfirm.com>; Denny, Danica <DDenny@frilot.com>
Subject: Couvillion v. White Marlin: Issues You Have Ignored

Daniel,

This is the second (an in some cases, third) time I am following up on these topics. By **EOB Monday**, please let me know if I need to go to the Court on these requests. **I need your documents properly produced no later than Friday.** If I do not hear from you, I will assume you are opposed and will prepare a letter.

1. Rogs: Please review Couvillion's answers to Interrogatory Nos. 3-5, 8-11, 12, 16, 17 and let me know whether Couvillion will provide more complete answers, or whether it intends to stand on its existing objections. **Couvillion maintains its responses and objections to the referenced interrogatories. Discovery is still ongoing. Defendants are well aware of the outstanding requests for documents and depositions. Couvillion will comply with its obligations, including its duty to supplement, as required by the Federal Rules of Civil Procedure.**
2. Production of Evidence in Usable Format: you have not produced your documents in a usable format. By EOB Monday, please confirm you will reproduce your documents as they were kept in the ordinary course of business. Please immediately re-produce Couvillion's document production consistent with the below rules, which (as you know) are standard in virtually every commercial case involving meaningful documents. **Couvillion produced documents in the same manner as Defendants. Please clarify if this request is in reference to any specific document so Couvillion can evaluate the same.**
3. 30(b)(6) Deposition: I've now asked for dates three times. Please provide dates or I will notice the deposition for a date and time of my choosing. **Defendants have consistently failed to provide Couvillion with dates for resuming Defendants' corporate depositions. We have also requested a new date for the deposition of Nigel Solida. Couvillion needs to finalize Defendants' corporate depositions prior to Defendants conducting the corporate deposition of Couvillion. Couvillion will provide a date for its corporate deposition as soon as Defendants offer a mutually agreeable date to complete the Defendants' corporate depositions.**

Instructions for Document Production

1. File Format:

- **PDF Files:** All documents should be produced in searchable PDF format. Ensure that the text within the PDFs is OCR'd (Optical Character Recognition) to allow for text searching and indexing.
- **Native Files:** For documents that exist natively in electronic format (e.g., Word documents, Excel spreadsheets, emails), produce these in their original native formats alongside the PDFs. Each native file should be accompanied by a corresponding PDF version.

2. Metadata:

- Provide a metadata load file in .dat or .csv format, including the following fields:
 - Bates Number
 - Document Date
 - Author
 - Recipient
 - CC (if applicable)
 - BCC (if applicable)

- Document Type (e.g., email, memo, report)
- File Name (for native files)
- Custodian
- File Path
- Confidentiality Designation (if applicable)

3. Load Files:

- Provide a load file compatible with standard litigation support software (e.g., Relativity, Concordance, Summation). The load file should link the metadata fields with the corresponding documents.

4. Folder Structure:

- Organize the documents in a logical folder structure that mirrors the original file system or is organized by custodian or date range.

5. Delivery:

- Provide the production electronically via secure file transfer, encrypted USB drive, or another agreed-upon secure method.
- Include a detailed index or cover letter describing the production set and the total number of documents and pages produced.

Thanks,

Jeb

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Joseph W. Golinkin II

Trial Attorney | Jordan, Lynch & Cancienne PLLC

(o) 713-955-4019 | (c) 832-250-6567

1980 Post Oak Blvd., Suite 2300 Houston, Texas 77056

www.jlcfirm.com | [Attorney Biography](#)

JL&C

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